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LETTER REGARDING NO FURTHER ACTION RECOMMENDATION FOR SOURCE
REMOVAL REPORT ADDENDUM AT BUILDING 2426 MAIN BASE NTC ORLANDO FL
11/29/1999
HARDING LAWSON ASSOCIATES



November 29, 1999

Document No.: 02530.116

Mr. David P. Grabka
Remedial Project Manager
State of Florida Department of Environmental Protection
Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Source Removal Report Addendum
Building 2426, Main Base
Naval Training Center, Orlando, Florida
CTO 107, Contract No.: N62467-89-D-0317

Dear Mr. Grabka:

A Site Assessment Report (SAR) was submitted for the above-referenced site on May 28, 1998 to the Florida Department of Environmental Protection (FDEP). The FDEP approved the recommendations in the SAR for the removal of petroleum-impacted soil on July 7, 1998. On February 25, 1999, source removal activities were conducted at Building 2426 and a Source Removal Report (SRR) was submitted to FDEP on June 1, 1999, to document the removal and disposal of petroleum-impacted soil from the site. On July 19, 1999, FDEP requested that additional assessment be conducted to assess if all petroleum-impacted soil was removed from the site (Attachment B).

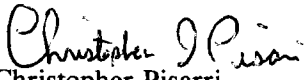
On October 27, 1999, Harding Lawson Associates (HLA) advanced a total of 6 soil borings and collected a total of 24 soil samples for organic vapor analysis following methods described in Chapter 62-770 of the Florida Administrative Code. A GeoProbe system owned by HLA was utilized to advance the soil borings and to collect soil samples from 0 to 1, 1 to 2, 2 to 3, and 3 to 4 feet below land surface (bls). Headspace organic vapor readings were measured by placing the soil sample in a 16-ounce glass jar and using a calibrated Organic Vapor Analyzer (OVA), Foxboro 128, equipped with a flame ionization detector, following procedures outlined in Chapter 62-770 FAC. A carbon filter was utilized to differentiate a total hydrocarbon response from naturally occurring methane gas. Filtered and unfiltered readings were obtained from two separate jars. All sampling analysis was performed in accordance with HLA's, FDEP-approved Comprehensive Quality Assurance Plan.

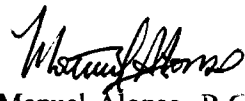
A total of six soil borings were advanced along the outside edge of the former excavated area. Figure 1 shows the soil boring locations (Attachment A). A total of 24 soil samples were collected at discrete intervals above the water table for OVA analysis. A summary of OVA results is presented in Table 1 (Attachment A). No petroleum-impacted soil was encountered in the soil samples analyzed. Based on the information provided in the SAR, the SRR and this SRR addendum, HLA recommends that Building 2426 site be considered for a no further action.

If you have any questions or need additional information, please contact the undersigned at (407) 522-7570.

Very Truly Yours,

HARDING LAWSON ASSOCIATES


Christopher Pisarri
Staff Geologist

 12/1/99
Manuel Alonso, P.G.
Senior Geologist
P.G. No. 0001256

cc: Wayne Hansel, Southern Division
Nick Ugolini, Southern Division
Rick Allen, Harding Lawson Associates
John P. Kaiser, Harding Lawson Associates

Attachments



ATTACHMENT A
TABLE AND FIGURE

Table 1
Summary of Organic Vapor Analysis, October 27, 1999

Source Removal Report Addendum
Building 2426, Main Base
Naval Training Center
Orlando, Florida

Soil Boring	Soil Sample	Sample Depth (feet bls)	Unfiltered ¹ (ppm)	Filtered ² (ppm)	Total Hydrocarbons (ppm)	Physical Observations
SB-01	SS-1	1	<1	NA	<1	No Odor
	SS-2	2	<1	NA	<1	
	SS-3	3	<1	NA	<1	
	SS-4	4	<1	NA	<1	
SB-02	SS-5	1	<1	NA	<1	No Odor
	SS-6	2	<1	NA	<1	
	SS-7	3	<1	NA	<1	
	SS-8	4	<1	NA	<1	
SB-03	SS-9	1	<1	NA	<1	No Odor
	SS-10	2	<1	NA	<1	
	SS-11	3	<1	NA	<1	
	SS-12	4	<1	NA	<1	
SB-04	SS-13	1	<1	NA	<1	No Odor
	SS-14	2	<1	NA	<1	
	SS-15	3	<1	NA	<1	
	SS-16	4	<1	NA	<1	
SB-05	SS-17	1	<1	NA	<1	No Odor
	SS-18	2	<1	NA	<1	
	SS-19	3	<1	NA	<1	
	SS-20	4	<1	NA	<1	
SB-06	SS-21	1	<1	NA	<1	No Odor
	SS-22	2	<1	NA	<1	
	SS-23	3	<1	NA	<1	
	SS-24	4	<1	NA	<1	

¹ Unfiltered sample reading are total hydrocarbon, including methane.

² Filtered sample reading are methane only.

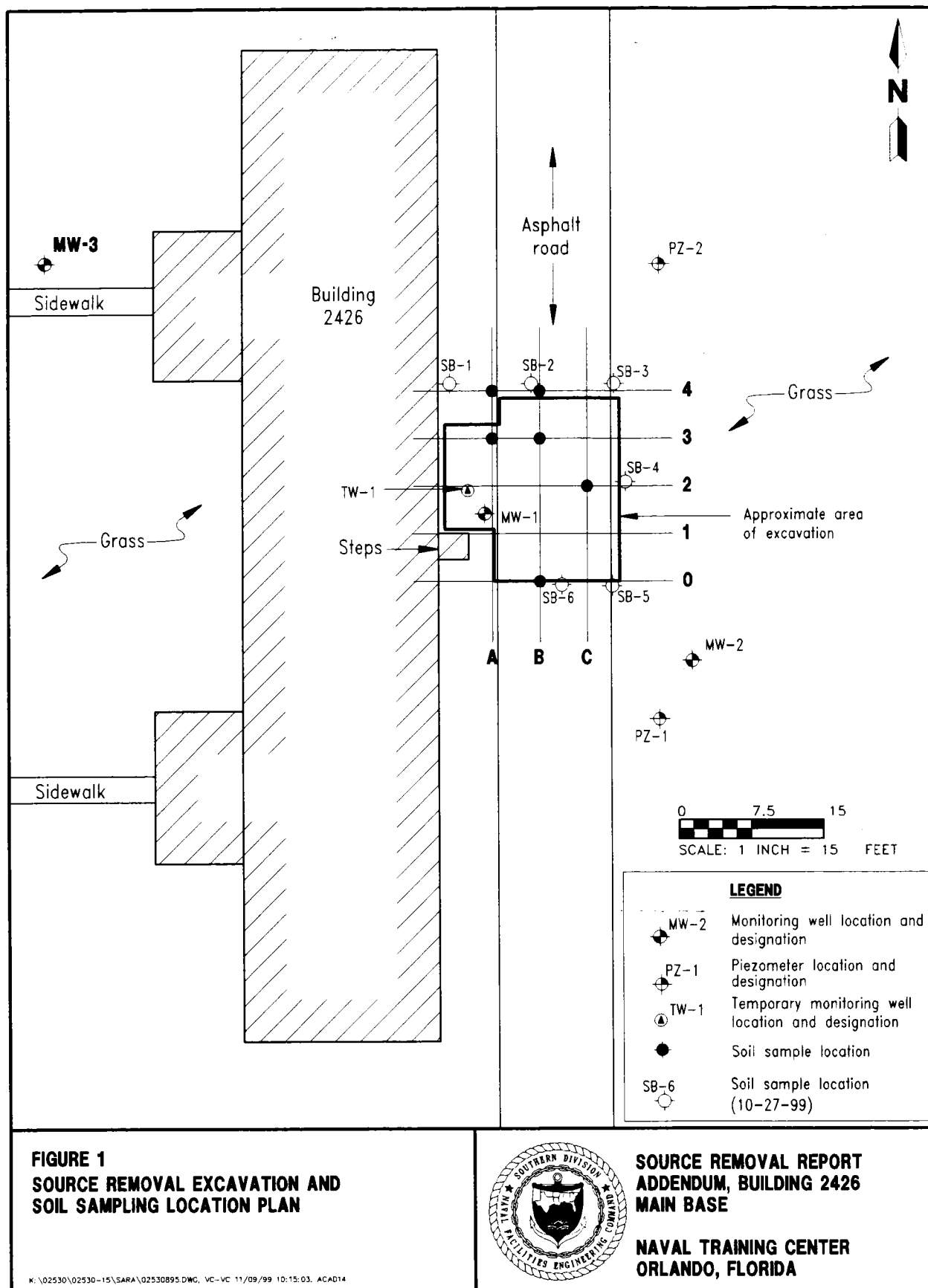
Notes: Groundwater encountered approximately 4.53 feet in monitoring well MW-2.

<1 = ppm indicates the nondetectable limit for Foxboro 128.

bls = below land surface.

ppm = parts per million.

< = less than.



ATTACHMENT B

**FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REVIEW LETTER
DATED JULY 19, 1999**



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

July 19, 1999

Mr. Nick Ugolini
Code 1843 (UST RPM)
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-9010

RE: Source Removal Report, Building 2426, Naval Training Center,
Orlando, Florida

Dear Mr. Ugolini:

I have completed the review of the Source Removal Report and request for No Further Action for Building 2426, Naval Training Center, Orlando, dated May 1999 (received June 7, 1999), prepared and submitted by Harding Lawson Associates. While the Source Removal Report adequately documents the amount and proper disposal of excavated petroleum contaminated soil, the report does not provide enough evidence that all petroleum compounds in soil and groundwater exceeding applicable regulatory criteria were removed with the excavation. Soil borings A4 and B4 at the northernmost boundary of the excavation still showed excessively contaminated soil as measured with an OVA at the 4 to 6 foot interval. Also, the approved May 1998 SAR indicated the presence of free product that was not addressed in this source removal. It may be that the water table has fallen, trapping previously measured product in soils that were excavated with the source removal, but that has not been proven. Additional assessment should be done to the immediate north of the excavation to determine if there are petroleum contaminants remaining.

If I can be of any further assistance with this matter, please contact me at (850) 488-3693.

Sincerely,

David P. Grabka
Remedial Project Manager

cc: Bill Bostwick, FDEP Central District Office
Rick Allen, Harding Lawson Associates, Jacksonville